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# Toledo Public Schools Aerospace Center

Bowsher High School, Toledo Express Airport, (419) 865-4651  
Air Agency Certificate # AE9T005R

December 12, 2008

Docket Management Facility  
US Department of Transportation  
1200 New Jersey Avenue, SE  
West Building Ground Floor  
Room W12-140  
Washington, DC 20590

DEPT. OF TRANSPORTATION  
DOCKETS  
1203 DEC 23 A 10 00

Subject: Petition for exemption from Code of Federal Regulations 14 CFR, Part 65.75(a) to allow the Aviation Mechanic (AMG) written tests to be administered after completing the corresponding portion of the curriculum.

Dear Sir or Madam,

The Toledo City School District, d/b/a Aerospace Center operates an FAA Approved Aviation Maintenance Technician School (AMTS) in Swanton, Ohio under Air Agency Certificate AE9T005R.

**PETITION:**

The Aerospace Center is requesting an exemption from 14 CFR, Part 65.75(a) to allow the Aviation Mechanic written tests (AMG, AMA, AMP) to be administered after completing the corresponding portion of the curriculum.

14 CFR Part 65.75(a) Knowledge Requirements: Title 14 of the Code of Federal Regulations, Part 65.75(a) prescribes that applicants must pass a written test, "after meeting the experience requirements of Part 65.77."

§65.77 requires applicants to complete training and, "present either an appropriate graduation certificate or certificate of completion from a certificated aviation maintenance technician school" before being eligible to take the written test for a certificate or rating.

Relief Sought: Aerospace Center is seeking exemption from 14 CFR Part 65.75(a) to allow students enrolled in its Part 147 Aviation Maintenance Technician School to take the Aviation Mechanic written tests (AMG, AMA, AMP) after completing the corresponding portion of the curriculum, prior to meeting the experience requirements of §65.77.

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Person(s) to be covered by the exemption: Aerospace Center Air Agency AE9T005R and students enrolled in its AMTS program in the Airframe, Powerplant curricula.

Information, views, or arguments to support the action sought: Testing immediately after learning is a universally accepted instructional principle that reinforces learning, and is academically sound. This is currently allowed with both the Airframe and Powerplant curriculums, but is not allowed at the completion of the General curriculum.

Students attending the school are enrolled in a single-rating program. This petition is structured to provide an opportunity for testing after the completion of any section of the curriculum (General, Airframe, Powerplant) regardless of the type of enrollment.

The Aerospace Center has established a procedure with the Cleveland FSDO (CLE) to identify and report graduates who are eligible to take the FAA written, oral, and practical tests to both the FSDO and the school's affiliated written test center. The same procedure would be used to identify and report students who would qualify to take the AMG written test after completion of the General curriculum, the AMA written test after completion of the Airframe curriculum, and AMP after completion of the Powerplant curriculum. A graduation certificate or certificate of completion would only be issued after the successful completion of the entire program in which the student is enrolled (Airframe, Powerplant).

The exceptional circumstances encountered by students enrolled in a 14CFR Part 147 AMTS are recognized and provided for by 14CFR 65.80 which permits a student to take the oral and practical tests prescribed by §65.79 before they meet the applicable experience requirements of §65.77.

The time penalty incurred by beginning the testing process before the completion of the entire curriculum would be more than offset by the academic soundness of immediate testing.

Public Interest: The public interest will be served by allowing aviation maintenance technician students to take the FAA written test covering a body of knowledge immediately following completion of their studies of that material. Student learning will be enhanced and reinforced by the immediate feedback provided by the testing experience. This immediate feedback, coupled with a sense of accomplishment, is expected to encourage students to continue their studies and reduce dropout rates.

This petition does not differ materially from others on record, and those requests have been deemed to be in the public interest.

Impact on Safety: A procedure is currently in place to identify and report students who are eligible to take the FAA written, oral and practical tests. This information is distributed to the

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Cleveland FSDO and the affiliated written test center. The same procedure would be used to identify and report students who would qualify to take the Aviation Mechanic written tests after the completion of the corresponding portion of the curriculum. All other requirements governing written testing, including time requirements for licensure completion would remain unchanged. A level of safety equal to that provided by this rule would be provided.

Economic Impact: There will be no impact on the economy.

## SUMMARY OF PETITION


The purpose of this petition is to allow the Aviation Mechanic written test (AMG, AMA, AMP) to be administered prior to graduating from the entire curriculum.

14 CFR, Part 65.75(a) Knowledge Requirements:

Relief Requested: Aerospace Center is petitioning for an exemption from this rule to allow students to take the written examination after completing the corresponding portion of the curriculum.

Aerospace Center appreciates any assistance you may be able to provide us in accomplishing these petitions.

Respectfully Submitted,

  
Nicholas R. Herman II  
Training Director  
Aerospace Center  
Toledo City District